## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA (Norfolk Division)

JANE DOE,

Plaintiff,

v.

Case No. 2:23-cv-470

NORFOLK STATE UNIVERSITY,

Defendant.

## DEFENDANT NORFOLK STATE UNIVERSITY'S OPPOSITION TO PLAINTIFF'S MOTION "TO REQUEST TRAUMA INDUCED COURT SETTLEMENT REVIEW"

Defendant Norfolk State University ("NSU"), by counsel, responds as follows in opposition to Plaintiff's Motion "To Request Trauma Induced Court Settlement Review" (the "Motion," ECF No. 16).

Much of the Motion appears to reiterate and/or expand on the meandering allegations in Doe's Complaint. Affording the Motion the liberal construction afforded to *pro se* plaintiffs, however, NSU interprets the Motion as requesting a settlement conference, in which Doe seeks to obtain "a Minors on Campus policy, as well as monetary settlement to Doe for 75 million dollars, as well as the offer of an Honorary PhD degree." (Motion at 2.)

In light of Doe's demand, and for reasons further explained in NSU's pending Motion to Dismiss (ECF No. 6), as well as its Motion for Disclosure of Doe's Identity (ECF No. 13), NSU feels strongly that a settlement conference would not be productive at this juncture and would not be an effective use of the parties' or the Court's resources. Accordingly, NSU respectfully requests that the Motion be denied.

Dated: December 20, 2023

Respectfully submitted,

## NORFOLK STATE UNIVERSITY

/s/ Heidi E. Siegmund

Jackie L. White (VSB No. 96317)

McGuireWoods LLP

1750 Tysons Boulevard

Suite 1800

Tysons, VA 22102

Telephone: (703) 712-5474

Facsimile: (703) 712-5206

jwhite@mcguirewoods.com

Heidi E. Siegmund (VSB No. 89569)

McGuireWoods LLP

Gateway Plaza

800 East Canal Street

Richmond, VA 23219

Tel: (804) 775-1000

Fax: (804) 775-1061

hsiegmund@mcguirewoods.com

Counsel for Defendant

## **CERTIFICATE OF SERVICE**

I hereby certify that on December 20, 2023, a copy of the foregoing was filed electronically using the CM/ECF system, and a hard copy was mailed to Plaintiff via certified mail and FedEx at:

120 Kidd Boulevard Norfolk, VA 23502

/s/ Heidi E. Siegmund

Heidi E. Siegmund (VSB No. 89569) McGuireWoods LLP Gateway Plaza 800 East Canal Street Richmond, VA 23219

Tel: (804) 775-1000 Fax: (804) 775-1061

hsiegmund@mcguirewoods.com

Counsel for Defendant